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United States Attorney

District of Oregon

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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Case No. 3:22-cv-01633-MO

Plaintiff,

v.

**COMPLAINT *IN REM* FOR
FORFEITURE**

**\$59,800.00 IN UNITED STATES
CURRENCY and
\$60,100.00 IN UNITED STATES
CURRENCY, *in rem*,**

Defendants.

Plaintiff, United States of America for its Complaint *in rem* for forfeiture, alleges:

COUNT 1

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21

U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

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II.

Defendants, *in rem*, \$59,800 U.S. currency and \$60,100 U.S. currency, were seized in the District of Oregon, and are now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendants, *in rem*, \$59,800 U.S. currency and \$60,100 U.S. currency constitute property furnished or intended to be furnished by any person in exchange for a controlled substance, or proceeds traceable to such an exchange, in violation of 21 U.S.C. §§ 841(a)(1) and 846 and is forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6), as more particularly set forth in the declaration of Deputy United States Marshal James Stratton, Asset Forfeiture Financial Investigator, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, Plaintiff, United States of America, prays that due process issue to enforce the forfeiture of Defendants, *in rem*, \$59,800 U.S. currency and \$60,100 U.S. currency; that due notice be given to all interested persons to appear and show cause why forfeiture of these Defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these Defendants be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this action.

Dated; October 25, 2022.

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Christopher L. Cardani
CHRISTOPHER L. CARDANI
Assistant United States Attorney

VERIFICATION

I, Deputy United States Marshal James Stratton, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Financial Investigator with the United States Attorney's Office, and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

/s/ James Stratton

JAMES STRATTON

Deputy United States Marshal